

REMARKS

I. INTRODUCTION

Claims 1, 7, and 12 have been amended. No new matter has been added. Thus, claims 1-16 remain pending in the present application. In view of the above amendments and the following remarks, it is respectfully submitted that all of the above-identified claims are allowable.

II. THE 35 U.S.C. §101 REJECTIONS SHOULD BE WITHDRAWN

Claims 1-6 stand rejected under 35 U.S.C. §101 because the invention is directed to non-statutory subject matter by not providing a tangible embodiment. 6/27/05 *Office Action*, page 2. Claim 1 has been amended to recite, "A system comprising a processor adapted to execute a software package." Accordingly, it is submitted that amended claim 1 provides a tangible embodiment for the modules. Thus, it is respectfully submitted that the 35 U.S.C. §101 rejection of claims 1-6 be withdrawn.

III. THE 35 U.S.C. §102(e) REJECTIONS SHOULD BE WITHDRAWN

Claim 7 stands rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,704,736 to Rys et al. (hereinafter "Rys"). 6/27/05 *Office Action*, pages 2-3.

Rys discloses a system and a method for transforming data between hierarchical information and rowset. Rys, Abstract. The method taught by Rys is for "transforming hierarchical information...into rowset and for transforming rowset into hierarchical data." Rys, col. 5, lines 1-5. In order to perform this transformation, Rys also includes a parser to process the data to be transformed between file types. Although Rys may disclose a method and a system for the transforming of files between hierarchical data and rowset, it is limited in its disclosure to

transformations between hierarchical information and rowset. Any user using the invention disclosed in Rys must concern him/herself with the transformation that is taking place and the types of files being transformed.

This is in contrast to independent claim 7 which recites “a conversion module applying a converter function to the configuration file to convert the configuration file from a first format incompatible with the application module to a second format compatible with the application module, *wherein the conversion module includes an extensible set of converter functions and the converter function is selected from the extensible set.*”

This functionality of the present invention eliminates the requirement of Rys that users consider the converter modules and the files being converted. An exemplary embodiment illustrated in Figure 7 shows that the conversion modules can accommodate XML files, OSGi files to proprietary files. Furthermore, since the plurality of conversion modules is extensible, the number and types of files possible for conversion is virtually unlimited. “If the developer decides to change the configuration file format, DOM converter 120 would include a new function to convert the new file format into the DOM format. However, any previous converter functions may be retained, allowing application program 130 access to information in any of these previously supported formats.” *Specification*, ¶[0019]. This allows the user and designer of the executable file that requires the conversion of these files not to be concerned with the conversion modules and/or functions and the types of files with which he/she is dealing.

Accordingly, Rys neither teaches nor suggests a system, “*wherein the conversion module includes an extensible set of converter functions and the converter function is selected from the extensible set*” as recited in independent claim 7. Thus, it is respectfully submitted that the 35 U.S.C. 102(e) rejection of claim 7 should be withdrawn.

IV. THE 35 U.S.C. §103 REJECTIONS SHOULD BE WITHDRAWN

Claims 1-6 and 8-16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,704,736 to Rys et al. (hereinafter "Rys") in view of U.S. Patent No. 6,662,186 to Esquibel et al. (hereinafter "Esquibel"). 6/27/05 *Office Action*, pages 3-4.

With regard to claims 1-6 and 8-16, the Examiner stated that Rys failed to disclose a receiving module that determines a plurality of original files. The Examiner attempts to cure this deficiency with Esquibel. 06/27/05 *Office Action*, page 4. However, neither Rys nor Esquibel teaches a system or method that incorporates a plurality of extensible converter functions as is recited in the rejected claims.

Esquibel discloses a system and method for propagating data from one file format and analyzes whether the file can be opened by the application. To reformat the file, an executable module is launched that is either attached to the file or accessible from a resource indicator. *Esquibel*, Abstract. Although as the Examiner points out, Esquibel can parse multiple types of files and attempt to convert them to the appropriate file for use by the application, the designer and user must be aware of the functions performing the conversion. If a file does not include a transfer module, the user must attach a module to the file to allow for conversion. *Esquibel*, col. 6 lines 39-52, col. 7 lines 19-54. Thus, Esquibel requires that information be included in the file that is to be translated in the form of either the translation executable itself or a reference to the location of the translation executable. Therefore, the user and designer of the executable must always be aware of the existing modules in order for the conversion to be successful.

In contrast, independent claim 1 recites "wherein the converter module includes an extensible set of converter functions and the converter function is selected from the extensible set." This allows the designer of the executable files not have to consider what the converter

modules and/or functions are performing. It also allows files to be converted at any time to any format as long as appropriate converter function is available. However, information for the converter function does not need to be stored in the file. In the scheme of Esquibel, data on the conversion must be stored in the file. Accordingly, neither Rys, nor Esquibel, alone or in combination, teaches nor suggests the above described limitation. Thus, it is respectfully submitted that the 35 U.S.C. 103 rejection of claim 1 and the claims depending therefrom (claims 2-6) should be withdrawn.

Similar to claim 1, independent claim 7 recites "wherein the conversion module includes an extensible set of converter functions and the converter function is selected from the extensible set." Therefore, for at least the reasons discussed in regard to claim 1, it is respectfully submitted that the 35 U.S.C. 103 rejection of the claims 8-11 that depend from claim 7 should be withdrawn.


Similar to claim 1, independent claim 12 discloses a system comprising of "wherein the converter function is one of an extensible plurality of converter functions." Therefore, for at least the reasons discussed in regard to claim 1, it is respectfully submitted that the 35 U.S.C. 103 rejection of claim 12 and the claims depending therefrom (claims 13-16) should be withdrawn.

CONCLUSION

In view of the amendments and the remarks submitted above, the applicants respectfully submit that the present case is in condition for allowance. All issues raised by the Examiner have been addressed, and a favorable action on the merits is thus earnestly requested.

Respectfully submitted,

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By: 
Michael J. Marcin (Reg. No. 48,198)

FAY KAPLUN & MARCIN, LLP
150 Broadway, Suite 702
New York, NY 10038
(212) 619-6000 (phone)
(212) 208-6819 (facsimile)